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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

Federal Communications Commission  
Office of the Secretary

In the Matter of )  
 )  
Administration of the North ) DA 91-1307  
American Numbering Plan )  
\_\_\_\_\_ )

COMMENTS OF BELLSOUTH CORPORATION

BELLSOUTH CORPORATION,  
SOUTH CENTRAL BELL TELEPHONE  
COMPANY, and  
SOUTHERN BELL TELEPHONE AND  
TELEGRAPH COMPANY

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Date: December 20, 1991

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COMMENTS OF BELLSOUTH CORPORATION

BellSouth, on behalf of its telephone companies, South Central Bell Telephone Company and Southern Bell Telephone and Telegraph Company, ("BellSouth") hereby submits comments in the above-styled matter.

I. SUMMARY OF COMMENTS

On September 26, 1991, the National Association of Regulatory Utility Commissioners (NARUC) filed a Petition requesting that the Commission establish a Notice Of Inquiry (NOI) to seek information concerning the administration of the North American Numbering Plan (NANP) and certain numbering codes used by the industry. BellSouth supports NARUC's request to initiate a NOI to address most of the numbering issues raised in the Petition. However, BellSouth believes that a NOI would not be the most appropriate vehicle for addressing all of the items raised in the Petition in that some of those matters (namely FGB CIC expansion, 800 and CIID codes) would be better addressed in other proceedings or forums for reasons expressed in these comments. In fact, a good deal of industry activity is

already underway, or has occurred, on these matters.

BellSouth also takes this opportunity to comment on the need to establish a specific procedural framework and time frame for discussion and timely resolution of the many numbering issues facing the industry.

## II. COMMENTS

### A. BellSouth Supports NARUC's Petition For A NOI With Only Minor Exceptions

BellSouth agrees with NARUC's conclusion that additional industry information and comment is needed on numerous issues surrounding the NANP and other numbering codes identified in the Petition, although some of those issues are better addressed in other industry forums or proceedings. The numbering codes identified in the Petition are critical components to the efficient operation of the public switched network and to enabling the introduction of new and innovative services accessed through that network. As such, the administration and use of these codes warrant further industry discussion and planning.

For the most part, the Commission should grant NARUC's Petition. The issuance of an NOI would serve to complement a number of related numbering efforts occurring within the industry. There are a few numbering issues, however, that are either already being adequately addressed or would be more appropriately addressed in other industry forum(s) or proceedings. Consequently, such issues need not be included in the NOI. Those numbering issues include, the following:

1. Feature Group B Carrier Identification Code ("CIC") Expansion

At this time, the industry is actively pursuing implementation of Feature Group B CIC code expansion from 3 to 4 digits. Industry participants, including the Industry Carriers Compatibility Forum (ICCF), the United States Telephone Association (USTA), the North American Numbering Plan (NANP) Administrator and staff members of the FCC's Common Carrier Bureau have been coordinating this effort for many months. It now appears that Feature Group B CIC expansion must occur in early 1993, or sooner, if the industry is to avoid a hiatus in Feature Group B CIC code availability. Implementation planning is well underway within the industry to meet this schedule. For this reason, BellSouth does not believe that this particular issue is an appropriate subject for a NOI. The information collected in response to a NOI would come too late to be of benefit to the decision makers involved in implementing Feature Group B CIC code expansion plans and could be disruptive of industry plans already in progress.

There are important related matters, however, which could be addressed in a NOI, and ultimately should be addressed in a rulemaking proceeding, in coordination with current ICCF efforts. These matters include the question of what constitutes the appropriate assignment guidelines for 4 digit Feature Group B CIC codes, and numerous other questions concerning the costs, customer impact and possible

alternatives to expanding Feature Group D CIC codes from 3 to 4 digits. Some of the issues of particular concern to the BellSouth and other local exchange carriers are the quantity of codes assigned to an entity, the extent to which interexchange carriers and other access customers will be allowed to retain CIC codes in excess of agreed upon industry guidelines, the extent to which the FCC intends to enforce such guidelines, and who will pay the costs of expanding CIC resources.

The projected exhaust of CIC codes dictates that these industry efforts and proceedings, including any related rulemaking, be concluded by the end of 1992. Given this time frame, the Commission may need to establish a separate NOI to address CIC issues specifically. A broader focused NOI as advocated by NARUC could then be established to address issues not requiring as early a resolution. Alternatively, the Commission could skip the NOI process and go straight to a separate CIC rulemaking proceeding immediately following the ICCF's action (expected July 1992) on the adoption of industry CIC guidelines.

2. 800 Service Access Code (SAC)  
Central Office Codes

In CC Docket No. 86-10, the Commission has been considering the conditions upon which 800 Data Base Service

would be mandated on a nationwide basis.<sup>1</sup> An integral issue to that proceeding has been the assignment, administration and portability of 800 numbers. There has been an extensive record developed concerning these matters in CC Docket No. 86-10. Given these circumstances, it would be inefficient and imprudent to separate 800 number issues from other 800 data base issues. Accordingly, the NOI should exclude 800 numbers from consideration.

3. Telecommunications Credit Card Issuers Identification ("CIID") Codes

NARUC is misinformed when it states that CIID codes are used in the routing of credit card calls. The CIID code is comprised of six digits and is requested by a carrier and assigned by Bellcore. The CIID code is used by the card issuing carrier as the first six digits of a credit card number, and is followed by eight digits which include the customer account number and the customer personal identification number (PIN). The CIID code allows any carrier which chooses to accept the issuer's card for billing purposes to determine the proper data base to query for credit card validation. The customer account number provides information concerning the user billing. The PIN digits provide security to prevent unauthorized card usage.

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<sup>1</sup> Provision of Access for 800 Service, CC Docket No. 86-10, 4 FCC Rcd 2824 (1989) recon. 6 FCC Rcd 5421 (1991) further reconsideration pending.

None of the digits appearing on credit cards are used for network routing purposes.

Currently the issuance and use of CIID codes appear to be working smoothly. BellSouth is unaware of any particular need for the industry to address CIID issues in a NOI. Even if unresolved CIID issues exist, this proceeding would not be the appropriate proceeding for their consideration since the other numbering codes which NARUC's Petition addresses focus on network routing and access issues which are unrelated to CIID usage.

B. NEED TO ESTABLISH SPECIFIC PROCEDURAL FRAMEWORK AND TIME FRAME TO ADDRESS AND RESOLVE NUMBERING ISSUES

As with CIC codes, the NANP is rapidly approaching exhaust of available numbering resources under the current structure. Industry relief efforts are currently targeted for January 1, 1995, when an additional 640 NPA codes will become available when the industry implements inter-changeable NPA codes (INPAs). As the NARUC Petition points out, there are many issues concerning the structure and administration of the NANP which must be addressed and resolved prior to implementation of INPA or any other NPA relief program. In addition to NANP administration and industry relief issues, there are other industry issues concerning other access codes (e.g., CIC codes) that may need to be addressed.



To ensure that these issues are dealt with by the industry in a timely and orderly manner, the Commission should set forth a specific procedural framework, including reasonable but specific time frames, in which to complete resolution of those issues which are critical to ensuring that adequate numbering resources are available for meeting industry needs. By setting forth an overall industry framework within which to proceed, the Commission can provide a fair opportunity to debate and resolve these issues within a specific time frame that still allows numbering changes to be implemented in a cost effective manner, with minimum disruption and inconvenience to consumers and service providers.

BellSouth proposes that the Commission consider adopting the following four step process to accomplish this objective:

Step 1 - Initiate Notice Of Inquiry

The Commission should grant NARUC's Petition, subject to the modifications discussed above, to initiate a Notice Of Inquiry on numbering issues. These industry comments can then be used for two purposes: (1) to help build industry consensus in those industry forums addressing numbering issues; and (2) to provide the Commission with information not otherwise available that would be useful in developing any notice of proposed rulemaking deemed necessary to implement decisions concerning numbering issues.

### Step 2 - Designate Industry Numbering Forum(s)

The Commission should designate an industry forum or forums to coordinate the development of industry recommendations on the future expansion and administration of the NANP. For example, the Common Carrier Bureau has already asked the NANP Administrator to institute an industry-wide effort to develop uniform NXX assignment guidelines. It is BellSouth's understanding that the NANP Administrator is currently developing a "strawman" proposal which will be available for industry review and discussion in the first and second quarter 1992 time frame. The NANP Administrator will then modify the "strawman" proposal to reflect any consensus reached at public industry meetings and will deliver the resulting documentation to the FCC no later than July 1, 1992 for FCC analysis and action. BellSouth supports this effort, but believes that a similar industry forum should be designated by the Commission to address other issues of industry concern regarding the overall structure and administration of the NANP which go beyond the scope of these current efforts. Activities of the forum may be required well beyond July of 1992 and could result in the need for a standing body to oversee resolution of numbering issues.

### Step 3 - Initiate Rulemaking

It is BellSouth's position that industry efforts in this area should, as with the effort to develop a uniform

set of national guidelines for the assignment of NXX codes, culminate in a formal rulemaking. Prior to implementation, new NANP assignment guidelines should be adopted as formal FCC rules based upon a Commission finding that such guidelines are in the public interest.

Since the current NANP is projected to exhaust in 1995 based solely on current NPA/NXX assignment practices, it is essential that this rulemaking process be completed and a related FCC order issued by the end of 1993.<sup>2</sup> It is BellSouth's belief that the magnitude, complexity and expense of industry NPA relief efforts will require this much lead time to implement INPA or any other industry solution to the exhaust problem in a timely and orderly manner. Industry information obtained pursuant to Steps 1 and 2, above, can provide the basis for the proposed rules set forth in the Notice of Proposed Rulemaking.

#### Step 4 - Implementation Of NANP Relief Efforts And Administrative Changes

Changes in how the NANP is administered and the provision of NPA relief will require substantial advance planning to implement. It is BellSouth's belief that the industry, including federal and state regulatory agencies, will need at a minimum late 1993 and all of 1994 to plan for NPA relief, assuming actual implementation of INPA begins on

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<sup>2</sup> For the reasons previously noted above, a separate rulemaking addressing CIC issues is needed and should be concluded by the end of 1992.

January 1, 1995.<sup>3</sup> The industry needs this time to plan and arrange for implementation requirements such as the education of customers, the modification or upgrade of telecommunications equipment and switches, and the scheduling and performance of testing and related work activities. The industry cannot afford to have a chaotic cut over to a new NANP structure. Similarly, changes in NANP administration if adopted coincident with NPA relief will also require advance planning.

While it may not be proper to address all of the above issues specifically in the context of the NARUC Petition, the Commission should use this opportunity to develop a timely and orderly framework for addressing and resolving the many numbering issues facing the industry. Based upon a planned INPA date of January 1, 1995, BellSouth suggests that related proceedings and activities in industry forum(s), including the subject NOI and any subsequent Commission rulemaking, be completed no later than the second half of 1993.

### III. CONCLUSION

For the above reasons, BellSouth requests that the Petition be granted in accordance with the above

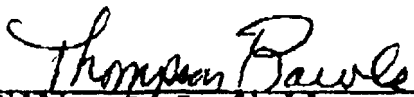
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<sup>3</sup> If INPA is to be debated as to whether it represents the appropriate NPA relief device, then that debate must be resolved immediately. While BellSouth fully supports INPA as the appropriate relief solution, it is recognized that some industry participants have questioned this plan.

modifications, and that the Commission initiate the other actions suggested herein.

Respectfully submitted,

BELLSOUTH CORPORATION,  
SOUTH CENTRAL BELL TELEPHONE  
COMPANY, and  
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DATE: December 20, 1991

CERTIFICATE OF SERVICE

I hereby certify that I have this 20th day of December, 1991, serviced all parties to this action with a copy of the foregoing COMMENTS by placing a true and correct copy of same in the United States mail, postage prepaid, addressed to:

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Utility Commissioners  
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Susan V. Queen